

Stormwater Loading Methods Meeting Summary - June 5, 2008

A number of “agreements in principle” were reached and, along with some general meeting notes, are described below. The LWG is seeking EPA agreement to these items.

Agreements in Principle

1. Conduct the divergent duplicate/replicate analysis in the draft methods. Where divergent duplicate/replicates are found, conduct further investigation with field and lab staff and notes to determine any reasons for divergence. If no substantial reason for divergence can be found, average the duplicate/replicate results consistent with methods for other sample pairs. If a substantial reason exists for divergence, segregate the data pair from further calculations.
2. Use RPD instead of CV for future calculations comparing replicate/duplicate results.
3. Use ProUCL detection limit handling for future distribution evaluations during the location reclassification analysis in instead of half the DL in Section 5.3 of the draft Methods Report.
4. In the future, do not conduct reclassification evaluations in Sections 5.3.2 and 5.3.4 of the draft methods report.
5. Continue to conduct the reclassification evaluation in Section 5.3.3 of the draft methods report regarding comparison of Heavy Industrial Representative Category locations and Unique Heavy Industrial locations. Make sure that any recategorization of Representative sites to Unique sites or vice versa is backed up by general information about the site activities and COIs that would lead to such a conclusion.
6. In the future, do not conduct the detailed outlier analysis in Section 5.4 of the draft Methods Report. Note this is based on the draft report conclusion that there are no readily identifiable reasons, related to other site or sample characteristics, that appear to cause outliers. An analysis including the second round of stormwater data, which is small relative to the first round, would not be expected to change this conclusion.
7. For future evaluations, use the range of ProUCL tools available to identify data distributions and resulting methods for non-detect substitutions. This is rather than using Regression on Order Statistics based on assumptions about the data distributions as conducted in Section 5.6 of the draft report.
8. It was agreed that weighting of location concentration data (whether by location sample size, drainage basin size, or other reason) in the loading calculation would not be conducted.
9. It was agreed that EPA and partners would reply in one week with any comments on the GRID modeling approach (Appendix C). This would help accelerate this schedule-critical component of the overall analysis. This would include agreement (if possible) on issues of: land use categorization, drainage area segment delineations, impervious area determinations, and use of property boundaries to apply unique site loading estimates.

Other Meeting Notes

The LWG asked for an accelerated approval of the methods report. EPA indicated that the fastest process would be for the Stormwater Technical Team to review and convene, as necessary, to agree on any final changes to the methods. EPA indicated that if the Stormwater Technical Team could reach agreement, EPA would be able to issue an approval letter for the methods without an official comment/response process.

Consequently, it was agreed that the EPA/DEQ representatives of the Stormwater Technical Team would continue their review and email that team on any comments/issues as they arise over the next two weeks. The Team would then have a conference call on the week on June 23 (June 26th from 9 am to noon was subsequently suggested by Carl Stivers) to discuss comments, with the goal of reaching final agreement on the methods. If major issues arise, the team may meet in person.